

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TAEMY OH and YONG K. OH,)
Plaintiffs)
v.) Case No. 1:18-cv-07214
OCWEN LOAN SERVICING, LLC,) Honorable Sharon Johnson Coleman
Defendant)

**AGREED MOTION TO EXTEND TIME TO FILE RESPONSE TO DEFENDANT'S
MOTION TO DISMISS**

NOW COME Taemy and Yong K. Oh ("Plaintiffs"), by and through their undersigned counsel, moving this Honorable Court to extend the time for Plaintiffs to file their response to Defendant Ocwen Loan Servicing, LLC's ("Defendant") Motion to Dismiss, and in support thereof, stating as follows:

1. On October 29, 2018, Plaintiffs filed their six-count complaint against Defendant. [Dkt. 1]
2. On January 14, 2019, after receiving an extension to file its responsive pleading, Defendant filed a partial Motion to Dismiss ("Defendant's Motion"). [Dkt. 14].
3. Plaintiffs' response to Defendant's Motion is currently due on or before March 12, 2019. [Dkt. 19].
4. Due to other professional deadlines and a pre-planned vacation in late February, Plaintiffs' counsel is seeking an additional 7 days, through March 19, 2019, to submit Plaintiffs' response to Defendant's twenty-three (23) page Motion.¹

¹ The undersigned counsel, Plaintiffs' lead counsel, was on vacation from February 16, 2019 through February 24, 2019. Moreover, the undersigned just completed labor-intensive summary judgment briefing

5. The undersigned certifies he has made his best efforts to complete Plaintiffs' response by the current deadline.

6. The undersigned conferred with Defendant's counsel about the relief sought herein, and Defendant has no objection.

7. The extension of time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation.

WHEREFORE, Plaintiffs respectfully request that this Court extend the deadline to file their response to Defendant's Motion to Dismiss through March 19, 2019, and extend Defendant's deadline to submit its reply through April 9, 2019, and for any other relief this Court deems appropriate.

Respectfully submitted,

/s/ Mohammed O. Badwan
Mohammed O. Badwan
Counsel for Plaintiffs
Sulaiman Law Group, Ltd.
2500 S. Highland Ave., Ste. 200
Lombard, IL 60137
Phone (630)575-8180
Fax: (630)575-8188
mbadwan@sulaimanlaw.com

on March 6, 2019 in *Jones v. Enhanced Recovery Company, LLC*, 17-cv-000234-RLY-DML (S.D. Ind. 2017).

CERTIFICATE OF SERVICE

I, Mohammed O. Badwan, an attorney, certify that on March 7, 2019, the foregoing was filed electronically using the Court's CM/ECF system, which will accomplish service on all counsel of record.

/s/ Mohammed O. Badwan